

GABROY LAW OFFICES
Christian Gabroy (#8805)
Kaine Messer (#14240)
The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
Henderson, Nevada 89012
Tel (702) 259-7777
Fax (702) 259-7704
christian@gabroy.com
kmesser@gabroy.com
Attorneys for Plaintiff Tiare Ramirez

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TIARE RAMIREZ, an individual;

Plaintiff,

vs.

WYNN LAS VEGAS, LLC; DOES I
through X; and ROE Corporations XI
through XX, inclusive;

Defendant.

Case No: 2:19-cv-01174-APG-DJA

**STIPULATION AND ORDER TO EXTEND
DEADLINE FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT (ECF No.
57)**

**STIPULATION AND ORDER TO EXTEND DEADLINE FOR PLAINTIFF TO
RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (ECF No. 57)**

The parties by and through their respective attorneys of record, hereby stipulate to a forty-five (45) day extension through February 3, 2022 for Plaintiff Tiare Ramirez ("Plaintiff") to respond to Defendant Wynn Las Vegas, LLC's ("Defendant") Motion for Summary Judgment (ECF No. 57).

Defendant filed its Motion for Summary Judgment (ECF No. 57) on November 29, 2021. Plaintiff's response is currently due on December 20, 2021. Plaintiff has requested the extension and Defendant has agreed to the request.

Good cause exceedingly exists for such extension. Unfortunately, Plaintiff's trial counsel's immediate family member suffered a medical emergency, requiring intubation. Such individual remains under supervised care, and unfortunately has very recently received an unfavorable diagnosis. This family emergency has necessarily required a

1 great deal of Plaintiff's trial counsel's time and attention. Further, Plaintiff's counsel has
2 previously-planned travel obligations to an outside jurisdiction that he is licensed in and
3 maintains an office in (Chicago, IL) during the interim.

4 Accordingly, the parties agree that Plaintiff's response to Defendant's Motion for
5 Summary Judgment (ECF No. 57) shall be due on February 3, 2022.

6 This request is not sought for any improper purpose or other reason of delay. No
7 party is prejudiced by the requested extension.

8 **IT IS SO STIPULATED.**

9 Dated: November 30, 2021

Dated: November 30, 2021

10 Respectfully submitted,

Respectfully submitted,

11 /s/ Christian Gabroy

/s/ Kelsey E. Stegall


12 Christian Gabroy, Esq. (#8805)
13 Kaine Messer, Esq. (#14240)
GABROY LAW OFFICES

Wendy Medura Krincek, Esq. (#6417)
Kelsey E. Stegall, Esq. (#14279)
LITTLER MENDELSON P.C.

14 *Attorneys for Plaintiff*

Attorneys for Defendant

15
16 **IT IS SO ORDERED.**

17
18
19 
20 _____
UNITED STATES DISTRICT JUDGE
DATE: December 1, 2021